

PARKER POHL LLP

99 Park Avenue | T 212-202-8886
Suite 1510 | F 646-924-3100
New York, NY 10016 | parkerpohl.com

M. Todd Parker
todd.parker@parkerpohl.com

July 19, 2021

Via ECF

Hon. Lorna G. Schofield
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Soranno v. Consolidated Edison Company of New York, Inc.*
Case No. 20-cv-9334 (LGS)

Dear Judge Schofield:

My firm represents Plaintiff Patrick Soranno. The Parties respectfully submit this joint status report pursuant to the Court's July 16, 2021 Order, and request a 60-day stay of discovery to allow the parties to seek a resolution through private mediation.

The Current Discovery Schedule

On May 26, 2021, the Court granted in part the parties' joint request for an extension of the discovery deadlines, which was the first request for an extension of those deadlines. The current deadline to complete fact discovery is August 11, 2021, and the current deadline to complete expert discovery is September 27, 2021.

Since the Court's Order, the parties have continued working diligently to complete discovery. Specifically, both parties have completed their respective production of documents in response to initial document demands, and anticipate the possibility of only modest additional requests based on the documents exchanged to date. In addition, Defendant has requested Plaintiff's medical records and social security disability records from third parties, but is still awaiting receipt of those records.

Mediation

Defendant's counsel and I recently began discussing the possibility of resolving this matter through mediation before engaging in further costly discovery, which will include six or more depositions. Our clients have now agreed to schedule mediation toward that end. Mr. Limmiatis and I are currently discussing choices of mediators and scheduling, and hope to have the mediation scheduled in the near future.

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Accordingly, in order to avoid the continuing cost of discovery and optimize the possibility of settlement, we respectfully request a 60-day stay of discovery to allow the parties' time to pursue mediation.

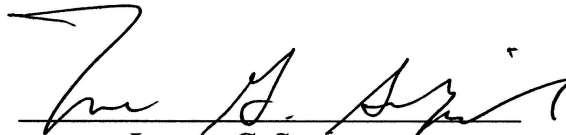
Respectfully submitted,

/s/ M. Todd Parker
M. Todd Parker

The application is **GRANTED in part**. This action is **STAYED for forty-five days**. By **September 3, 2021**, the parties shall file a status letter apprising the Court of the outcome of settlement discussions.

So Ordered.

Dated: July 20, 2021
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE